

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)	
East Ohio Gas Company d/b/a Dominion)	
East Ohio for Approval of Tariffs to)	
Recover Certain Costs Associated With its)	Case No. 11-5843-GA-RDR
Automated Meter Reading Deployment)	
Through an Automatic Adjustment)	
Clause, and for Certain Accounting)	
Treatment.)	

**MOTION FOR A ONE WEEK CONTINUANCE IN THE
PROCEDURAL SCHEDULE AND
AND
REQUEST FOR EXPEDITED RULING
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

The Office of the Ohio Consumers' Counsel ("OCC") moves the Public Utilities Commission of Ohio ("PUCO" or "the Commission"), the legal director, the deputy legal director, or the Attorney Examiner for a one-week continuance in the procedural schedule which currently requires the following:

- | | |
|-----------|---|
| March 30: | Deadline for Motions to Intervene, and Staff and Intervenor Comments on the Company Application. |
| April 6: | Deadline for Dominion to file a Statement informing the Commission whether issues raised in the Comments have been resolved. |
| April 10: | Deadline for all parties to file expert testimony. |
| April 11: | Deadline for the parties to file a Stipulation resolving the matters or deadline for a Motion for a continuance of the Hearing. |

April 11: Evidentiary Hearing at 10:00 am.¹

OCC requests a one week continuance, for all of these deadlines as noted below:

April 6: Deadline for Motions to Intervene, and Staff and Intervenor Comments on the Company Application.

April 13: Deadline for Dominion to file a Statement informing the Commission whether issues raised in the Comments have been resolved.

April 17: Deadline for all parties to file expert testimony.

April 18: Deadline for the parties to file a Stipulation resolving the matters or deadline for a Motion for a continuance of the Hearing.

April 18: Evidentiary Hearing at 10:00 am.

OCC has discussed this request with representatives of Dominion, Staff and Oho Partners for Affordable Energy (“OPAE”) and all of the parties have indicated no opposition to the one-week continuance requested by OCC and for an expedited ruling on this request.

OCC requests that an expedited ruling on this motion be issued by the Commission, the legal director, the deputy legal director, or the attorney examiner, pursuant to Ohio Adm. Code 4901-1-12(F), without the filing of memoranda, on the basis that issuance of such a ruling will not adversely affect a substantial right of any party. In the event that Commission, the legal director, the deputy legal director, or the attorney examiner declines to issue such a ruling, OCC requests an expedited ruling under Ohio Adm. Code 4901-1-12(C). OCC’s motion and request should be granted for good cause shown, as fully explained in the following memorandum.

¹ *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of Tariffs to Recover Certain Costs Associated with its Automated Meter Reading Deployment Through an Automatic Adjustment Clause, and for Certain Accounting Treatment*, Case No. 11-5843-GA-RDR, Entry (March 5, 2012).

Respectfully submitted,

BRUCE J. WESTON

/s/ Joseph P. Serio

Joseph P. Serio, Counsel of Record
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MEMORANDUM IN SUPPORT

Under the Commission’s rules, continuances and extensions of time may be granted upon motion of any party “for good cause shown.”² OCC meets this standard as explained below.

OCC is requesting the one-week continuance so that OCC will have the opportunity to review responses to its discovery in advance of filing any Comments in this case. The current Dominion Automated Meter Reading (“AMR”) case is only one of four similar accelerated mains replacement programs that all have similar time lines.³ This confluence of time lines resulted in OCC not being able to serve discovery upon Dominion until Monday March 26, 2012. Responses to that Discovery is due on Monday April 2, 2012. With Comments currently due on Friday March 31, 2011, OCC would not

² Ohio Admin. Code 4901-1-13(A); see also Ohio Admin. Code 4901-1-12(A) generally permitting motions to be filed, accompanied by memorandum in support.

³ See also, *In the Matter of the Annual Application of Columbia Gas of Ohio, Inc. for an Adjustment to Rider IRP and Rider DSM Rates*, Case No. 11-5803-GA-RDR; *In the Matter of the Annual Application of the East Ohio Gas Company d/b/a Dominion East Ohio to. Adjustment its Pipeline Infrastructure Replacement Program Cost Recovery Charge and Related Matters*, Case No. 12-812-GA-RDR; *In the Matter of the Annual Application of Duke Energy Ohio for an Adjustment to Rider AMRP Rates*, et al, Case Nos. 11-5809-GA-RDRa and 11-5810-GA-ATA.

be otherwise able to incorporate the Discovery response into its Comments. A one-week continuance will permit OCC to incorporate the Discovery responses into its Comments and may actually expedite a resolution of the case, depending on the Discovery response.

In addition, the current time and date for the evidentiary hearing -- 10:00 am on April 11, 2012 is the same time and date for an evidentiary hearing in the Columbia Gas IRP/DSM case. Both counsel for OCC are assigned to both cases and would be prejudiced if required to proceed under the current schedules. A one-week continuance would avoid this conflict.

For all the above-stated reasons, OCC requests a one-week continuance in the current procedural schedule and an expedited ruling so that the parties will not be required to submit Comments on Friday, March 31, 2012.

In the event that Commission, the legal director, the deputy legal director, or the attorney examiner declines to issue such a ruling, OCC requests an expedited ruling under Ohio Adm. Code 4901-1-12(C). OCC contacted all of the parties and all of the parties indicated that they had no opposition to OCC request for a one-week continuance in the procedural schedule or for an expedited ruling.

Respectfully submitted,

BRUCE J. WESTON

/s/ Joseph P. Serio

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing pleading has been served upon the below-named persons via regular electronic mail this 28th day of March, 2012.

/s/ Joseph P. Serio

Joseph P. Serio
Assistant Consumers' Counsel

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Summary: Motion Motion for a One Week Continuance in the Procedural Schedule and Request for Expedited Ruling by the Office of the Ohio Consumers' Counsel electronically filed by Patti Mallarnee on behalf of Serio, Joseph P.